

**IN THE UNITED STATES DISTRICT COURT
DISTRICT OF SOUTH CAROLINA
SPARTANBURG DIVISION**

GRAHAM BOSWELL,

Plaintiff,

v.

CASE NO. 7:23-cv-05467

**WOFFORD COLLEGE, CATHERINE
RAND, and DAVID HOGSED**

Defendants.

**DEFENDANT CATHERINE RAND'S RESPONSES TO LOCAL RULE 26.01
INTERROGATORIES**

Defendant, Catherine Rand, ("Defendant") by and through her undersigned counsel, hereby submits these Responses to Local Rule 26.01 Interrogatories as follows:

A. State the full name, address, and telephone number of all persons or legal entities who may have a subrogation interest in each claim and state the basis and extent of said interest.

Response: None known.

B. As to each claim, state whether it should be tried jury or nonjury and why.

Response: Plaintiff has requested a jury trial on all non-equitable issues.

C. State whether the party submitting these responses is a publicly owned company and separately identify: (1) each publicly owned company of which it is a parent, subsidiary, partner, or affiliate; (2) each publicly owned company which owns ten percent or more of the outstanding shares or other indicia of ownership of the party; and (3) each publicly owned company in which the party owns ten percent or more of the outstanding shares.

Response: Not applicable.

D. State the basis for asserting the claim in the division in which it was filed (or the basis of any challenge to the appropriateness of the division). *See* Local Civil Rule 3.01.

Response: Defendant Rand does not challenge the appropriateness of the division in which this matter was filed.

E. Is this action related in whole or in part to any other matter filed in this District, whether civil or criminal? If so, provide: (1) a short caption and the full case number of the related action; (2) an explanation of how the matters are related; and (3) a statement of the status of the related action. Counsel should disclose any cases which may be related regardless of whether they are still pending. Whether cases are related such that they should be assigned to a single judge will be determined by the Clerk of Court based on a determination of whether the cases: arise from the same or identical transactions,

happenings or events; involve the identical parties or property; or for any other reason would entail substantial duplication of labor if heard by different judges.¹

Response: No.

F. If the Defendant is improperly identified, give the proper identification and state whether counsel will accept service of an amended summons and pleading reflecting the correct identification.

Response: Defendant Rand is properly identified.

G. If you contend that some other person or legal entity is, in whole or in part, liable to you or the party asserting a claim against you in this matter, identify such person or entity and describe in detail the basis of said liability.

Response: Defendant Rand is not presently aware of any person or entity that is liable to Plaintiff. Defendant Rand reserves the right to amend this response, if necessary.

H. In an action in which jurisdiction is based on diversity under 28 U.S.C. § 1332(a), a party or intervenor must, unless the Court orders otherwise, name—and identify the citizenship of—every individual or entity whose citizenship is attributed to that party or intervenor. This response must be supplemented when any later event occurs that could affect the Court’s jurisdiction under § 1332(a).

Response: Defendant Rand is an individual who is domiciled in Fulton County, Georgia.

¹ This information is required in addition to completion of the “related cases block on the JS44 Civil Cover Sheet. Although the Civil Cover Sheet required only that you disclosed pending related cases, this interrogatory and this District’s assignment procedures require disclosure of any prior or pending case whether civil or criminal.

Dated this the 27th day of February, 2024.

Respectfully submitted,

/s/ Scott F. Talley

Scott F. Talley, Esquire (Fed ID: 9016)

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**ATTORNEYS FOR DEFENDANT CATHERINE
RAND**

Therefore, both categories should be disclosed in response to this interrogatory as well as on the JS44 Civil Cover Sheet.

CERTIFICATE OF SERVICE

The undersigned hereby certifies that on February 27, 2024, a true and correct copy of the foregoing has been filed with the Clerk of the United States District Court for the District of South Carolina Spartanburg Division using the CM/ECF system. The Court's CM/ECF system will send an email notification of the foregoing filing to all counsel of record who are registered with the Court's CM/ECF system:

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/s/ Scott F. Talley